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Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LAURA LEIGH, individually, and WILD
HORSE EDUCATION, a non-profit
corporation,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF THE
INTERIOR, BUREAU OF LAND
MANAGEMENT, TRACY STONE-
MANNING, Director of the Bureau of Land
Management, and JON RABY, Nevada
State Director of the Bureau of Land
Management,

Federal Defendants.

Case No. 3:23-cv-00568-ART-CSD

**STIPULATION TO EXTEND
REMAINING BRIEFING
DEADLINES (First Request)**

Federal Defendants the United States Department of the Interior, Bureau of Land Management (“BLM”), Tracy Stone-Manning, and Jon Raby, and Plaintiffs Laura Leigh and Wild Horse Education (together, “the Parties”), hereby stipulate to extend the remaining briefing deadlines in the Court’s Modified Scheduling Order, ECF No. 36, by two (2) weeks.

In support of this stipulation, the Parties state as follows:

1 WHEREAS, on September 25, 2024, the Court entered the Modified Scheduling Order
2 which set a schedule for a cross-motion for summary judgment briefing whereby Plaintiffs
3 would file their opening motion by December 13, 2024, Federal Defendants respond/cross-
4 move by February 14, 2025, Plaintiffs respond-reply by March 14, 2025, and Federal
5 Defendants reply by April 11, 2025. ECF No. 36.

6 WHEREAS, Plaintiffs filed their opening motion on December 13, 2024. ECF No. 38.

7 WHEREAS, due to commitments and deadlines in other matters that have arisen since
8 the Modified Scheduling Order was entered, on January 10, 2025, counsel for Federal
9 Defendants contacted counsel for Plaintiffs as to whether Plaintiffs would stipulate to extend
10 remaining briefing deadlines by two (2) weeks.

11 WHEREAS, Plaintiffs agreed to Federal Defendants' requested extension.

12 WHEREAS, this is the Parties' first stipulation to extend briefing deadlines in the
13 Modified Scheduling Order.

14 WHEREAS, the Parties agree that there is good cause to extend the briefing deadlines
15 by two weeks to accommodate the schedule of Federal Defendants' counsel.

16 NOW, THEREFORE, the Parties hereby stipulate and agree that the remaining briefing
17 deadlines set in the Modified Scheduling Order should be extended by 2 weeks as follows:

- 18 • **February 28, 2025**: Federal Defendants' combined Response to Plaintiffs' Motion
19 and Cross-Motion for Summary Judgment (40 pages);
- 20 • **March 28, 2025**: Plaintiffs' combined Response to Federal Defendants' Motion and
21 Reply in support of their own Motion (25 pages);
- 22 • **April 25, 2025**: Federal Defendants' Reply (25 pages).

23
24 Respectfully submitted this 13th day of January, 2025.

25 TODD KIM, Assistant Attorney General
26 U.S. Department of Justice
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28

/s/ Joseph W. Crusham
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IT IS SO ORDERED:

**UNITED STATES DISTRICT JUDGE
UNITED STATES MAGISTRATE JUDGE**

DATED: